IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LINDA CAMMAROTO, :

:

Plaintiff,

:

v. : CASE NO.

:

CACH, LLC,

:

Defendant. :

:

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant CACH, LLC ("CACH") hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Pike County, Pennsylvania and in support thereof avers as follows:

- CACH is the Defendant in a civil action originally filed on October 10,
 2023, in the Court of Common Pleas of Pike County, Pennsylvania titled *Linda Cammaroto v. CACH, LLC* and docketed to Case No. 996-2023.
- 2. This removal is timely under 28 U.S.C. § 1446(b). CACH received service of Plaintiff's Complaint by Certified Mail on October 19, 2023.
- 3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

- 4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against the Defendant alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.
- 5. On this date, CACH has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Pike County, Pennsylvania.

WHEREFORE, Defendant CACH respectfully removes this case to the United States District for the Middle District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER BURNETTE, LTD.

By: /s/ Lauren M. Burnette

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Counsel for Defendant CACH, LLC

Dated: November 17, 2023

CERTIFICATE OF SERVICE

I certify that on November 17, 2023, a true copy of the foregoing document was served on all unrepresented parties and counsel of record by electronic service and/or U.S. Mail, postage prepaid..

MESSER STRICKLER BURNETE, LTD.

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Counsel for Defendant CACH, LLC

Dated: November 17, 2023